

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SOUND AROUND, INC.,)	
)	
Plaintiff,)	Case No.: 1:24-cv-01986-JHR
)	
v.)	
)	Notice of Motion for
)	Preliminary Injunction
MOISES FRIEDMAN, SHULIM ELIEZER)	
ILOWITZ, ML IMPORTS, INC., CYRF, INC.,)	
LRI GROUP, LLC, EXECUTIVE SERVICES,)	
EXECUTIVE LAUNDRY, LLC, MDF)	
MARKETING, INC., WORLD GROUP)	
IMPORT, LLC, HEFEI PAIDONG OUTDOOR)	
PRODUCTS CO., LTD.,)	
)	
Defendants.)	

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that Plaintiff Sound Around Inc., by and through its attorneys, Holland & Knight LLP, will move this Court pursuant to Federal Rule of Civil Procedure 65 before the Honorable Jennifer H. Rearden, United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312 as soon as the matter may be heard, for an Order granting a preliminary injunction (1) to enforce the restrictive covenants against the Individual Defendants, Friedman and Ilowitz, (2) ordering the return of all confidential, proprietary, and trade secret information, (3) enjoining the Defendants from continuing their unlawful activity, and (4) for other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Plaintiff Sound Around Inc. submits its Memorandum of Law, which is being filed contemporaneously with this notice, and the Declaration of Jeremiah Brach, with exhibits, which is being filed contemporaneously with this notice.

Dated: April 22, 2024

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Marisa Marinelli
787 Seventh Ave., 31st Floor
New York, NY 10019
(212) 513-3200
Marisa.Marinelli@hklaw.com
Attorneys for Plaintiff Sound Around, Inc.

Jesus E. Cuza (*PHV submitted*)
Florida Bar No. 428991
Email: jesus.cuza@hklaw.com
Rebecca Canamero (*PHV submitted*)
Florida Bar No. 86424
Email: rebecca.canamero@hklaw.com
Annelise Del Rivero
Florida Bar No. 1003234 (*PHV submitted*)
Email: annelise.delrivero@hklaw.com
701 Brickell Avenue, Suite 3300
Miami, Florida 33131